



DEPARTMENT OF THE ENVIRONMENT

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William Donald Schaefer
Governor

Martin W. Walsh, Jr.
Secretary

May 15, 1989

Ms. Laura Boornazian, Chief
DELMARVA/DC/WV CERCLA
Remedial Enforcement Section
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Dear Ms. Boornazian:

The Hazardous and Solid Waste Management Administration (HSWMA) has completed its review of the "Final Phase II Feasibility Study" dated April 12, 1989 for Maryland Sand, Gravel and Stone. A copy of HSWMA's comments has been enclosed for your review.

If you have any questions regarding these comments, please call me or David Healy at (301)-631-3438.

Sincerely,

Frank Henderson, Chief
CERCLA Response Division

FH:amf

Enclosure

cc: Mr. Ronald Nelson
Mr. Michael Kilpatrick
Mr. David Healy
Mr. William Cahill

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HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
COMMENTS ON THE FINAL PHASE II FEASIBILITY STUDY (FS)
FOR MARYLAND SAND, GRAVEL AND STONE SITE

Our comments are as follows:

1. Page 3-5, Second Paragraph: Is monitoring well "LS-4" as stated in this paragraph a misprint? Should this read "LS-1"?
2. Page 3-7, Second Paragraph: Language in the third sentence of this paragraph should be modified to reflect that off-site wells were selected for monitoring based on their location (i.e. downgradient) along the southern perimeter of the site and that they cover only the southern boundary of the site, not the "entire site".
3. Page 3-8: The corresponding water bearing unit for each residential well should be included on this page.
4. Page 3-10, Second Paragraph: This paragraph discusses the use of an "appropriate statistical test" to identify variations in contaminant levels detected in chosen monitoring wells. As previously stated, the detailed statistical method (i.e. as indicated in the March 14, 1989 comments) that is intended to be used for evaluating data gathered from Phase II FS monitoring wells must be described in this document. If this is not done, then a statement indicating that this will be included as part of the design must be stated in this section. This will apply throughout the entire document where statistical interpretation of monitoring data is referenced (i.e. Pages 5-9, 3-18 etc.).
5. Page 3-12: This decision process should include a specific point at which bottled water will be provided to affected off-site residences. This would most logically follow the first detection of contaminants above MCLs in any residential well sampled.
6. Page 3-14, Third Paragraph: This paragraph is difficult to understand. The questions on this paragraph are as follows:
 - A. Are the infiltration trenches or basins proposed here the same as those proposed for collection of the shallow groundwater from the upper sand unit? Are they in addition to the Phase I treatment trenches?
 - B. What extraction wells are referenced here, Phase I or Phase II? If Phase I, how will these trenches influence groundwater flow back toward these wells?
 - C. Define and describe the term "selective discharge" as used in this paragraph.

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7. Page 3-19: In the decision process illustrated here, "Annual Analysis" at the beginning of the process should be amended to read as follows, "Quarterly/Semiannual/Annual Review of Monitoring Data". Also, the point at which installation of extraction wells would occur is not clearly stated in the text describing this alternative. The text should be revised accordingly.

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